

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RABIH ABOUL EL HOSN,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY; KRISTI NOEM, Secretary of
Homeland Security; CALEB VITELLO, Acting
Director of U.S. Immigration and Customs
Enforcement; DREW BOSTOCK, Field Office
Director for Immigration and Customs
Enforcement, Seattle; U.S. DEPARTMENT OF
STATE; MARCO RUBIO, Secretary of State,

Defendants.

Case No. 2:25-cv-00188-JNW

STIPULATED MOTION AND
~~[PROPOSED]~~ ORDER TO STAY
PROCEEDINGS

Under Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, Plaintiff and Defendants stipulate and jointly move to stay this case for six months until January 15, 2026. Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

STIPULATED MOTION AND ~~[PROPOSED]~~ ORDER
TO STAY PROCEEDINGS
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Here, the parties ask for time to work toward a resolution that may resolve this case without the need for judicial intervention, conserving the parties' and the Court's resources. The parties agree an order by the Board of Immigration Appeals (BIA) reopening Plaintiff's immigration proceedings restored his prior status as a legal permanent resident (LPR). Plaintiff requires a replacement LPR card and intends to complete a necessary biometrics appointment abroad to finalize his application for a replacement card. The parties request time for Plaintiff to schedule and complete that appointment, and for U.S. Citizenship and Immigration Services (USCIS) to adjudicate his application once completed. If USCIS is unable to adjudicate the application by the time the stay expires, it will provide a status report to the Court. If the application is approved, Plaintiff will dismiss this case, with each party to bear their own costs and fees, if any.

So stipulated.

Respectfully submitted July 15, 2025,

s/ Benjamin E. Stein

BENJAMIN E. STEIN

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—*and*—

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s/ Annalisa L. Cravens

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Counsel for Defendants

I certify this motion contains 252 words,
in compliance with the Local Civil Rules.

~~PROPOSED~~ ORDER

It is hereby ORDERED the parties' motion is GRANTED.

DATED this 17th day of July, 2025.



HON. JAMAL N. WHITEHEAD
United States District Judge